

Now comes Plaintiff, by and through counsel, and does hereby move this Court for an *Ex Parte* Order and, subsequently, an Immediate Order in the event that the *ex parte* order is either granted or denied, for the return of specific items of personal property to the Plaintiff. The grounds for this motion and the specific personal property, are more fully

described in the attached copy of a Verified Complaint being filed at this time. The allegations set forth in the Complaint are incorporated herein by reference and for the sake of brevity will not be repeated herein.

Plaintiff has suffered and will continue to suffer irreparable harm in the event that her personal property is not returned to her forthwith. She may suffer the loss of a job, inability to transported herself, to purchase food or other necessary items as well as an inability to obtain medical care and treatment. In the event that the Court denies the request for *ex parte* relief, Plaintiff respectfully requests an expedited hearing on the motion.

RESPECTFULLY SUBMITTED,

Miles D. Fries (0016415)  
Attorney for Plaintiff  
GOTTLIEB, JOHNSTON, BEAM  
& DAL PONTE, P.L.L.  
320 Main Street, P.O. Box 190  
Zanesville, Ohio 43702-0190  
Telephone: (740) 452-7555  
Facsimile: (740) 480-1664

VERIFICATION

I, Heather Anders, being first duly cautioned and sworn, state that the answers to the foregoing Interrogatories are true and correct to the best of my knowledge and belief.

  
NAME

STATE OF OHIO :  
COUNTY OF MUSKINGUM :

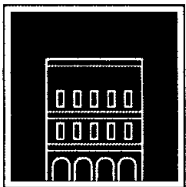
SS

Sworn to and subscribed before me this 27th day of September 2021, a Notary Public for the State of Ohio, County of Muskingum.



LORI M SHOOK  
Notary Public  
State of Ohio  
My Comm. Expires  
July 11, 2026

  
NOTARY PUBLIC, STATE OF OHIO



**GOTTLIEB, JOHNSTON,  
BEAM & DAL PONTE, PLL**

Attorneys At Law  
Legal Arts Building  
320 Main Street  
P.O. Box 190  
Zanesville, Ohio  
43702-0190  
(740) 452-7555  
FAX (740) 480-1664  
www.ZanesvilleLaw.com

**REQUEST FOR SERVICE**

Please issue a summons, a copy of the foregoing, upon the Defendants, Perry County Sheriff Department, c/o William Barker, William R. Barker, Sheriff of Perry County and Officer Brian Alexander at the addresses set forth above by personal service by process server Chris Wise and make the same returnable according to law.

\_\_\_\_\_  
Miles D. Fries (0016415)  
Attorney for Plaintiff

**GOTTLIEB, JOHNSTON,  
BEAM & DAL PONTE, PLL**

Attorneys At Law

Legal Arts Building

320 Main Street

P.O. Box 190

Zanesville, Ohio

43702-0190

(740) 452-7555

FAX (740) 480-1664

[www.ZanesvilleLaw.com](http://www.ZanesvilleLaw.com)